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REPLY TO THE ATTENTION OF:

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

RE: A7 Phase 1 Precertification

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) draft Project Specific Plan (PSP) for Area 7 (A7), Phase 1 precertification.

The document details U.S. DOE's approach for precertification surface scanning and physical sampling activities for A7, Phase

U.S. EPA has several comments on the document, which are enclosed. Therefore, U.S. EPA disapproves the A7, Phase 1 PSP. U.S. DOE must submit a revised document and responses to comments within (30) thirty days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Sally Robison, U.S. DOE-HDQ
Jamie Jameson, FERMCO
Terry Hagen, FERMCO
Tim Poff, FERMCO

TECHNICAL REVIEW COMMENTS ON
"THE DRAFT PROJECT SPECIFIC PLAN FOR AREA 7, PHASE I
PRECERTIFICATION PHYSICAL SAMPLING AND REAL-TIME SCAN"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 1.3 Page #: 1-1 Lines #: 29 and 30
Specific Comment #: 1

Comment: The project specific plan (PSP) states that "all samples are to be transported from the field to the on-site laboratory, where they will be analyzed or shipped to an off-site laboratory, as appropriate." The text should be revised to (1) identify the samples and associated analyses for the on-site and off-site laboratories and (2) explain the rationale for laboratory selection. The text should also discuss potential data comparability issues associated with the analytical results that will be obtained from the on- and off-site laboratories.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 1.3 Page #: 1-2 Lines #: 4 and 5
Specific Comment #: 2

Comment: According to the PSP, the field activities must be consistent with the Data Quality Objectives (DQO), SL-054, Revision 0 (Appendix A), which states that "any physical soil samples collected during precertification will be collected under a separate DQO." Because physical soil samples are to be collected as part of the proposed precertification investigation, the PSP should be revised to cite the appropriate DQO and to include it in an appendix.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1 Page #: 2-1 Lines #: 19 and 20
Specific Comment #: 3

Comment: The text states that "if a hot spot is confirmed, delineation will take place as another phase of precertification under this PSP." This statement implies that the delineation will be done under Phase III. However, Table 2-1 of the PSP indicates that both hot spot confirmation and delineation will be done under Phase II. This apparent inconsistency should be resolved.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1.1 Page #: 2-1 Lines #: 28 and 29
Specific Comment #: 4

Comment: The text states that "one or more batch files will be acquired for each subarea." The terms "batch file" and "subarea" should be defined in the context of the precertification investigation. For example, the text should be revised to state how many measurements will typically constitute a batch file.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1.1 Page #: 2-2 Lines #: 7 through 9
Specific Comment #: 5

Comment: According to the PSP, the high-purity germanium (HPGe) detector readings will be obtained "using a triangular grid with 11-M nodes (approximately 95 percent coverage)." It is unclear whether "11-M" signifies an equilateral triangle whose sides are 11 meters long or has some other meaning. The text should be revised to clarify this matter.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1.1 Page #: 2-2 Lines #: 9 through 12
Specific Comment #: 6

Comment: The PSP states that "if the HPGe identifies a total uranium concentration greater than two times the FRL (2xFRL) when set at the 1-meter height, Phase 2 measurements will be obtained at that location with a detector height of 31 cm to confirm and delineate the hot spot, as necessary." It is unclear why only total uranium concentrations and not radium 226 and thorium 232 concentrations are to be compared to the final remediation levels (FRL). The text should be revised to clarify this matter.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.2 Page #: 2-5 Lines #: 28 and 29
Specific Comment #: 7

Comment: The text states that "physical sampling will be conducted to confirm that the unbound concentrations of arsenic are below FRL." The text should be revised to explain what the term "unbound" means in the context of the PSP.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: 2-9 Lines #: NA
Specific Comment #: 8

Comment: Table 2-1 lists only three sodium iodide-based field instruments instead of four instruments for use during Precertification Phase I. The table should be revised to include the Environmental Monitoring System in order to be consistent with other parts of the PSP. In addition, the

detector heights for the sodium iodide-based instruments should be added to the table.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: NA Page #: 2-10 Lines #: NA
 Specific Comment #: 9
 Comment: Table 2-5 lists three analytical methods for measuring arsenic concentrations in soil samples. The table should be revised to identify one sample preparation method (for example, "Test Methods for Evaluating Solid Waste" [SW-846] Method 3050B) and one sample analysis method (for example, SW-846 Method 7060A).

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 5.0 Page #: 5-1 Lines #: 29 and 30
 Specific Comment #: 10
 Comment: The text refers to Phase III HPGe data for the first time in the PSP. The PSP should be revised to be consistent in describing the number of phases associated with the proposed precertification investigation.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 5.0 Page #: 5-2 Lines #: NA
 Specific Comment #: 11
 Comment: Section 5.0 does not discuss the data validation efforts associated with the laboratory sample analyses. The text should be revised to state that 100 percent of the laboratory data will be validated by a party that is independent of the data generating group.